

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

EVERETT DE'ANDRE ARNOLD, et al.	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 4:20-CV-
	)	01802
v.	)	
BARBERS HILL INDEPENDENT	)	JURY TRIAL REQUESTED
SCHOOL DISTRICT, et al.	)	
Defendants.	)	

**APPENDIX IN SUPPORT OF PLAINTIFF K.B.'S MOTION FOR  
A PRELIMINARY INJUNCTION**

Plaintiff Cindy Bradford, on behalf of her minor son, K.B., submits this Appendix in Support of his Motion for a Preliminary Injunction:

**Exhibit**      **Description**

- 1**      Declaration of Professor D. Wendy Greene, dated June 29, 2020
- 1-A**      CV of Professor D. Wendy Greene
- 2**      Declaration of K.B., dated May 26, 2020.
- 3**      Declaration of Sandy Arnold, dated May 26, 2020
- 4**      Declaration of Kobe Bradford, dated June 28, 2020
- 5**      Declaration of Cindy Bradford, dated June 28, 2020
- 6**      Declaration of K.B., dated June 28, 2020
- 7**      Declaration of De'Andre Arnold, dated May, 26, 2020
- 8**      BHISD Student Handbook, 2019-2020, as revised on January 6, 2020

9       *Barbers Hill High School*, U.S. News & World Report,  
<https://www.usnews.com/education/best-high-schools/texas/districts/barbers-hill-isd/barbers-hill-high-school-18643> (last visited June 26, 2020)

10      *Sterling High School*, U.S. News & World Report,  
<https://www.usnews.com/education/best-high-schools/texas/districts/goose-creek-c-independent-school-district/sterling-high-school-19141> (last visited June 26, 2020)

11      *SAT (Scholastic Assessment Test)*, Barbers Hill Independent School District,  
<https://www.bhisd.net/departments/curriculum-instruction/advanced-academics/sat-scholastic-assessment-test> (last visited June 26, 2020)

12      K.B. Level I Grievance Hearing Form, dated January 27, 2020

13      K.B. Level I Grievance Response, dated February 18, 2020

14      K.B. Level II Grievance Appeal, dated February 28, 2020

15      K.B. Level II Grievance Response, dated June 23, 2020

16      Gabrielle Fonrouge, *American-Indian boy banned from school for having long hair*, N.Y. Post (Aug. 24, 2017 2:21 PM)  
<https://nypost.com/2017/08/24/american-indian-boy-banned-from-school-for-having-long-hair/>

17      Letter from Teresa Yeh, Trial Attorney, U.S. Department of Justice, to Superintendent Greg Poole, dated October 17, 2017

18      Lena V. Groeger, Annie Waldman, and David Eads, *Miseducation, Is there racial inequality at your school, Barbers Hill Independent School District*, ProPublica (October 16, 2018)  
<https://projects.propublica.org/miseducation/district/4809450>.

19      BHISD Educational Planning Guide, 2017-2018

20      Board of Education Local Board Meetings Policy, dated November 21, 2019

21      Greg Poole, *Separate is still not equal*, Baytown Sun (Feb. 11, 2020),  
[http://baytownsun.com/opinion/guest\\_columns/article\\_9a5f7122-4c5d-11ea-95e7-3fd44b314f6f.html](http://baytownsun.com/opinion/guest_columns/article_9a5f7122-4c5d-11ea-95e7-3fd44b314f6f.html)

**22** Keith Garvin & Tierra Smith, *More Barbers Hill students angered by school dress code, forced to cut their hair as well*, KPRC Houston (Jan. 24, 2020, 9:28 P.M.),  
<https://www.click2houston.com/news/local/2020/01/24/more-barbers-hill-students-angered-by-school-dress-code-forced-to-cut-their-hair-as-well/>

**23** Tony Fabelo, et al., *Breaking School's Rules: A Statewide Study of How School Discipline Relates to Students' Success and Juvenile Justice Involvement*, Council of State Governments Justice Center/The Public Policy Research Institute, July 2011, available at  
[https://ppri.tamu.edu/files/Breaking\\_Schools\\_Rules.pdf](https://ppri.tamu.edu/files/Breaking_Schools_Rules.pdf)

Dated: June 29, 2020

/s/ Nicholas E. Petree

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on counsel of record on this 29th day of June, 2020.

/s/ Nicholas E. Petree  
Nicholas E. Petree